## REMARKS

Claims 1-23 remain pending in the application, with claims 24-39 having been previously canceled.

The Applicants respectfully request that the Examiner initial and return a copy of the IDSs filed on June 30, 2008, August 21, 2008, September 23, 2008, February 17, 2009, March 24, 2009, May 5, 2009, June 8, 2009, and February 2, 2010.

### Claims 1-7, 11-19, 22 and 23 over Ramasubramani, Barzegar and Iwama

In the Office Action, claims 1-7, 11-19, 22 and 23 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,507,589 to Ramasubramani et al. ("Ramasubramani") in view of U.S. Patent No. 5,894,478 to Barzegar et al. ("Barzegar"), and in further view of U.S. Patent No. 6,600,735 to Iwama et al. ("Iwama). The Applicants respectfully traverse the rejections.

The Applicant respectfully suggests that the need to combine THREE references to alleged obviousness is an indication of the non-obviousness of claims 1-7, 11-19, 22 and 23.

Claims 1-7, 11 and 12 recite, *inter alia*, at least one **protocol gateway** to (1) register at least one registered **message router** in a message router table and to (2) **manage a TCP/IP network connection** between the at least one registered message router and the at least one protocol gateway based on the message router table. Claims 13-19, 22 and 23 recite, *inter alia*, (1) registering, with at least one **protocol gateway**, at least one registered **message router** in a message router table and (2) **managing**, with the at least one protocol gateway, a **TCP/IP network connection** between the at least one registered message router and the at least one protocol gateway based on the message router table.

Thus, claims 1-7, 11-19, 22 and 23 commonly recite a **protocol gateway** that (1) registers a **message router** in a message router table and (2) **manages a TCP/IP network connection** between at least one registered

message router and at least one protocol gateway based on the message router table.

The Examiner argues in the Response to Arguments section of the Office Action that "Iwama teaches a network gateway which includes a registration table for manages devices, those devices including routers (Col. 10, lines 59-62). That device registration table is a separate concept and teaching from any bandwidth allocation table (Col. 10, lines 53-62)."

Applicants have thoroughly reviewed all of Iwama, including the Examiner stressed portions including col. 10, lines 59-62, and do not find a teaching of a **registration** table. Applicants have reproduced Iwama at col. 10, lines 59-62 below, with no mention of a **registration** table. As discussed in more detail below, Iwama's bandwidth reservation condition table is **NOT** a message router table, as claimed.

The Examiner acknowledged that Ramasubramani fails to teach "a registered message router, having a TCP connection with the message router, wherein the router is registered in a message router table, and that the gateway registers said router." (see Office Action, page 3)

The Examiner relies on Iwama to allegedly teach a "gateway [that] adds an entries to a table (Col. 11, lines 54-65)." (see Office Action, page 3) The Applicants respectfully disagree.

Iwama teaches at col. 11, lines 54-65:

> In the bandwidth reservation condition table (1610) are registered data on a bandwidth or a band which is secured as a result of the bandwidth reservation processing by the bandwidth control unit (1505). In this case, with respect to each device number (1603), a counterpart device number (1611) and a reservation bandwidth (1612) are assumed to be stored, for example. When a plurality of counterpart devices are provided for a device number (1603), data of plural lines may be provided to the device number (1603). The bandwidth is usually registered in bits/second. If the reservation bandwidth (1612) is equal to zero, it means that no reservation is made. (*emphasis added*)

A bandwidth reservation condition table is **NOT** a message router table, as claimed. Iwama bandwidth reservation condition table specifies a bandwidth that is reserved by a particular device, not providing **routing**

information for a message. Iwama fails to teach or suggest a message router table, much less a message router table that is registered **by a protocol gateway**, as required by claims 1-7, 11-19, 22 and 23.

Moreover, entries within Iwama's reservation condition table are provided **to** a gateway device 102 (see col. 10, lines 49-58), not **by** the gateway device 102. Iwama fails to teach or suggest a **protocol gateway** that registers a **message router** in a message router table, as required by claims 1-7, 11-19, 22 and 23.

The Examiner relied on "Barzegar [to allegedly teach] a system with a protocol gateway that establishes connections through a message router (Column 3, lines 56-58)". (see Office Action, page 3)

Thus, the combination of references would at best result in routing message to addressable portions (Ramasubramani), a protocol gateway that establishes connections through a message router (Barzegar), and a bandwidth reservation condition table that specifies a bandwidth that is reserved by a particular device (Iwama). Ramasubramani, Barzegar and Iwama, either alone or in combination, fail to disclose, teach or suggest a **protocol gateway** that (1) registers a **message router** in a message router table and (2) **manages a TCP/IP network connection** between at least one registered message router and at least one protocol gateway based on the message router table, as recited by claims 1-7, 11-19, 22 and 23.

Accordingly, for at least all the above reasons, claims 1-7, 11-19, 22 and 23 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 8 and 20 over Ramasubramani, Barzegar, Iwama and Boyle**

Claims 8 and 20 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Barzegar, and Iwama, and in further view of U.S. Patent No. 6,119,167 to Boyle et al. ("Boyle"). The Applicants respectfully traverse the rejections.

Claims 8 and 20 are dependent upon claims 1 and 13 respectively, and are allowable for at least the same reasons as claims 1 and 13.

Claim 8 recites, *inter alia*, at least one **protocol gateway** to (1) register at least one registered **message router** in a message router table and to (2) **manage a TCP/IP network connection** between the at least one registered message router and the at least one protocol gateway based on the message router table. Claim 20 recites, *inter alia*, (1) registering, with at least one **protocol gateway**, at least one registered **message router** in a message router table and (2) **managing**, with the at least one protocol gateway, a **TCP/IP network connection** between the at least one registered message router and the at least one protocol gateway based on the message router table. As discussed above, Ramasubramani, Barzegar, and Iwama, either alone or in combination, fail to disclose, teach or suggest such features.

The Examiner relies on Boyle to allegedly disclose a wireless protocol gateway and http proxy that creates a TCP/IP socket connection, and managing the TCP/IP connection. (see Office Action, page 6) However, a thorough reading of Boyle reveals that he too fails to teach or suggest a message router table, much less a **protocol gateway** that registers a **message router** in a message router table, as recited by claims 8 and 20.

Thus, Ramasubramani, Barzegar, Iwama, and Boyle, either alone or in combination, fail to disclose, teach or suggest a **protocol gateway** that (1) registers a **message router** in a message router table and (2) **manages a TCP/IP network connection** between at least one registered message router and at least one protocol gateway based on the message router table, as recited by claims 8 and 20.

Accordingly, for at least all the above reasons, claims 8 and 20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 9 over Ramasubramani, Barzegar, Iwama, and Kung**

Claim 9 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Barzegar, Iwama, and further in view of U.S. Patent No. 6,826,173 to Kung et al. ("Kung"). The Applicants respectfully traverse the rejections.

Claim 9 is dependent upon claim 1, and is allowable for at least the same reasons as claim 1.

Claim 9 recites, *inter alia*, at least one **protocol gateway** to (1) register at least one registered **message router** in a message router table and to (2) **manage a TCP/IP network connection** between the at least one registered message router and the at least one protocol gateway based on the message router table. As discussed above, Ramasubramani, Barzegar, and Iwama, either alone or in combination, fail to disclose, teach or suggest such features.

Kung was relied on to allegedly teach a system with multiple protocol gateways that communicate using SNMP communications. (see Office Action, page 7) However, a thorough reading of Boyle reveals that he too fails to teach or suggest a message router table, much less a **protocol gateway** that registers a **message router** in a message router table, as recited by claim 9.

Thus, Ramasubramani, Barzegar, Iwama, and Kung, either alone or in combination, fail to disclose, teach or suggest at least one **protocol gateway** to (1) register at least one registered **message router** in a message router table and to (2) **manage a TCP/IP network connection** between the at least one registered message router and the at least one protocol gateway based on the message router table, as recited by claim 9.

Accordingly, for at least all the above reasons, claim 9 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 10 and 21 over Ramasubramani, Callon and Boyle2**

Claims 10 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Callon, and further in view of U.S. Patent No. 6,138,158 to Boyle et al. ("Boyle2"). The Applicants respectfully traverse the rejections.

Claims 10 and 21 are dependent upon claims 1 and 13 respectively, and are allowable for at least the same reasons as claims 1 and 13.

Claim 10 recites, *inter alia*, at least one **protocol gateway** to (1) register at least one registered **message router** in a message router table and to (2) **manage a TCP/IP network connection** between the at least one registered message router and the at least one protocol gateway based on the message router table. Claim 21 recites, *inter alia*, (1) registering, with at least one **protocol gateway**, at least one registered **message router** in a message router table and (2) **managing**, with the at least one protocol gateway, a **TCP/IP network connection** between the at least one registered message router and the at least one protocol gateway based on the message router table.

Boyle2 was relied on to allegedly a maximum segment size, determining if a message exceeds the maximum segment size, and segmenting a message into a plurality of message segments, with none of the plurality of message segments exceeding the maximum segment size. (see Office Action, pages 7 and 8) A thorough reading of Boyle2 reveals that Boyle2 fails to teach or suggest a message router table, much less a **protocol gateway** that registers a **message router** in a message router table, as recited by claims 10 and 21.

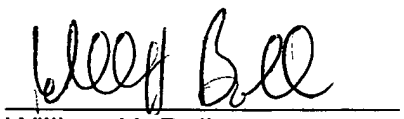
Thus, Ramasubramani, Barzegar, Iwama, and Boyle2, either alone or in combination, fail to disclose, teach or suggest a **protocol gateway** that (1) registers a **message router** in a message router table and (2) **manages a TCP/IP network connection** between at least one registered message router and at least one protocol gateway based on the message router table, as recited by claims 10 and 21.

Accordingly, for at least all the above reasons, claims 10 and 21 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



William H. Bollman
Reg. No.: 36,457
Tel. (202) 261-1020
Fax. (202) 887-0336

**MANELLI DENISON & SELTER PLLC**
2000 M Street, N.W. 7th Floor
Washington D.C. 20036-3307
WHB/df